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June 23, 2003

Mr. Harold Gillespie, P.E.
Georgia Environmental Protection Division
Solid Waste Management Program
4244 International Parkway
Suite 104
Atlanta, Georgia 30354

Re: Site Acceptability Study for Decatur County Proposed Landfill near Attapulgus

Dear Mr. Gillespie,

We are very interested in Decatur County's proposed landfill due to the potential effects it may have on Lake Talquin in Leon County, Florida. The proposed landfill is very close to creeks discharging to Swamp Creek which is a tributary of Lake Talquin. Lake Talquin is already under stress from pollutants in Swamp Creek and the Ochlockonee River, which are both listed as impaired in the Federal Total Maximum Daily Load (TMDL) program. We do not wish to see any further degradation to this valuable fishing and recreational resource. We have reviewed the Site Acceptability Study prepared by Geosciences-TTL for Decatur County and have several concerns as follows:

1. We concur with Mr. Cown's June 6, 2003 letter regarding the number of borings/piezometers installed within the proposed landfill footprint. PZ-5 was the only boring/piezometer within the landfill footprint and limestone was encountered 39 feet below ground surface. More borings are needed to better define the subsurface stratum within the proposed landfill footprint to determine the interaction with the aquifer.
2. Stormwater ponds appear to be tied directly to the groundwater. The study should address how these ponds are to be used for stormwater treatment considering the effects on the surficial aquifer and surface waters downstream.
3. Surface water drainage ditches are proposed. The study should explain how stormwater treatment will be provided and segregated from the landfill

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operation before discharge to tributaries of Lake Talquin in Leon County, Florida. It is unclear where the outfalls will occur from the proposed landfill. It appears that discharge will have to occur to Swamp Creek which discharges to Lake Talquin. Swamp Creek has been listed as an impaired tributary in the TMDL program. The study should address the impact of the landfill on this already impaired Creek.

4. The report states that no part of the proposed site is within the 100-year floodplain as identified on the Flood Insurance Rate Map (FIRM). However, there are many excavated areas that can be flood prone based on the site disturbance from mining. The disturbance causes changes to pre-mining curve numbers, and the resulting ponds, some of which are directly tied to the groundwater, can act like impervious area. Depending on the final grading, discharge from these areas can have significant downstream flooding effects in Swamp Creek which discharges to Lake Talquin. We request that the Acceptability Study address this flooding concern.
5. The study proposes a leachate collection system, but it doesn't discuss how the leachate will be treated or where it will be transported. This could have an effect on the feasibility of a landfill for this site.
6. Finally, there was no discussion in the study of a contingency plan if the liner and fill material below the liner is breached. There should be some reasonable assurance that there is a solution to protect downstream wells, aquifers and surface waters.

Please consider the above in your review of this Site Acceptability Study. We request to be copied on all correspondence regarding the Study and Landfill siting. Should you have any questions or require further information, please contact me at (850)488-9300.

Sincerely,



John P. Kraynak, P.E.,
Director of Environmental Compliance Division

cc: Leon County Board of County Commissioners
Parwez Alam, Leon County Administrator
Herb Thiele, County Attorney
Earl Perry, Decatur County Commissioner, District 1
Alan Thomas, Decatur County Administrator
Gary Johnson, Director of Growth & Environmental Management